

Docket Management

Docket: 02N-0276 - Bioterrorism Preparedness; Registration of Food Facilities,
Section 305

Comment Number: EC-174

Comment Record			
Commentor	Ms. Janet Wengler	Date/Time	2003-04-04 10:52:37
Organization	Reckitt Benckiser Inc.		
Category	Company		
Comments for FDA General			
Questions			
1. General Comments		<p>April 3, 2003 Dockets Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane Room 1061 Rockville, MD 20852 Re: Docket No. 02N-276. Registration of Food Facilities Under the Public Health and Bioterrorism Preparedness and Response Act of 2002; Notice of Proposed Rulemaking Reckitt Benckiser Inc. manufactures and markets food and consumer products. We manufacture FRENCH'S mustards and Taste Toppers and other retail and restaurant condiments in facilities in Missouri and New York. We support FDA's efforts to ensure the safety and security of America food supply and we wish to cooperate in the implementation of this new registration requirement. We fully support the comments being submitted by the Grocery Manufacturers of America relating to this matter and agree that it is consistent with the purposes of the Bioterrorism Act. While we feel that FDA is on the right track we wish to offer a few comments. The inclusion of food categories as part of the initial registration is still an issue. FDA has not yet published the guidance documents that are necessary to make a determination as to whether this additional requirement will be beneficial. The thirty-day updates should be limited to changes in the information for emergency contact persons at a facility. All other information could then be submitted on an annual basis. This will lessen the burden for both FDA and the registered facilities while maintaining emergency notification capabilities. Further clarification of the scope of the registration requirement is needed. There are still some ambiguities. Transportation vehicles should not be classified as facilities. Additionally, some facilities, such as the home of a sales representative or research and development</p>	

location should also be excluded. Docket # 02N-0276 Reckitt Benckiser Comments Page 2 CONCLUSION FDA has done an admirable job in creating a registration system that will fulfill the goals of the Bioterrorism Act. Attention to the few areas mentioned here and more fully discussed in GMA's comments will make the registration requirement both more efficient and effective. Thank you for your consideration of these comments. Sincerely, Janet M. Wengler Director of Government Affairs Reckitt Benckiser Inc. (254) 546-0298 janet.wengler@reckittbenckiser.com

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April 3, 2003

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Docket No. 02N-276. Registration of Food Facilities Under the Public Health and Bioterrorism Preparedness and Response Act of 2002; Notice of Proposed Rulemaking

Reckitt Benckiser Inc. manufactures and markets food and consumer products. We manufacture FRENCH'S mustards and Taste Toppers and other retail and restaurant condiments in facilities in Missouri and New York.

We support FDA's efforts to ensure the safety and security of America food supply and we wish to cooperate in the implementation of this new registration requirement. We fully support the comments being submitted by the Grocery Manufacturers of America relating to this matter and agree that it is consistent with the purposes of the Bioterrorism Act.

While we feel that FDA is on the right track we wish to offer a few comments. The inclusion of food categories as part of the initial registration is still an issue. FDA has not yet published the guidance documents that are necessary to make a determination as to whether this additional requirement will be beneficial.

The thirty-day updates should be limited to changes in the information for emergency contact persons at a facility. All other information could then be submitted on an annual basis. This will lessen the burden for both FDA and the registered facilities while maintaining emergency notification capabilities.

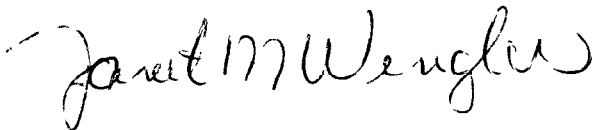
Further clarification of the scope of the registration requirement is needed. There are still some ambiguities. Transportation vehicles should not be classified as facilities. Additionally, some facilities, such as the home of a sales representative or research and development location should also be excluded.

CONCLUSION

FDA has done an admirable job in creating a registration system that will fulfill the goals of the Bioterrorism Act. Attention to the few areas mentioned here and more fully discussed in GMA's comments will make the registration requirement both more efficient and effective.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, reading "Janet M. Wengler". The signature is written in a cursive, flowing style.

Janet M. Wengler
Director of Government Affairs
Reckitt Benckiser Inc.
(254) 546-0298
janet.wengler@reckittbenckiser.com